

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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BLACK LOVE RESISTS IN THE RUST, by and through its Co-Directors Natasha Soto and Shaketa Redden and on behalf of its members; DORETHEA FRANKLIN, TANIQUA SIMMONS, DE'JON HALL, and JANE DOE, individually and on behalf of a class of all others similarly situated,

Plaintiffs,

v.

Case No.: 1:18-cv-719

CITY OF BUFFALO, N.Y.; BYRON B. BROWN, Mayor of the City of Buffalo, in his individual and official capacities; BYRON C. LOCKWOOD, Commissioner of the Buffalo Police Department, in his individual and official capacities; DANIEL DERENDA, former Commissioner of the Buffalo Police Department, in his individual capacity; AARON YOUNG, KEVIN BRINKWORTH, PHILIP SERAFINI, ROBBIN THOMAS, UNKNOWN SUPERVISORY PERSONNEL 1-10, UNKNOWN OFFICERS 1-20, each officers of the Buffalo Police Department, in their individual capacities,

Defendants.

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**DECLARATION OF PETER SAHASRABUDHE IN OPPOSITION TO  
PLAINTIFF'S MOTION TO DEPOSE BYRON LOCKWOOD  
FOR FOURTEEN HOURS**

PETER SAHASRABUDHE, under penalty of perjury and pursuant to 28 U.S.C.

§ 1746, declares the following to be true and correct:

1. I am an attorney associated with Hodgson Russ LLP, attorneys for the defendants The City of Buffalo, Byron B. Brown, Byron C. Lockwood, Daniel Derenda, Aaron Young, Kevin Brinkworth, Philip Serafini, Robbin Thomas, Unknown Supervisory Personnel 1-10, and Unknown Officers 1-20 (collectively referred to hereinafter as "Defendants"). As an

attorney of record, I am familiar with the proceedings in this matter and submit this Declaration in response and opposition to Plaintiffs' motion to depose Defendant Byron Lockwood for fourteen hours.

2. The purpose of this Declaration is to place before the Court previous deposition testimony which is relevant to the Court's consideration of Plaintiffs' current motion.

3. Attached as **Exhibit A** is excerpted deposition testimony given by Chief Aaron Young of the Buffalo Police Department.

4. Attached as **Exhibit B** is excerpted deposition testimony given by Chief Kevin Brinkworth.

5. Attached collectively as **Exhibit C** are pages showing the time used by Plaintiffs' counsel to depose Defendant Daniel Derenda, the former Commissioner of the Buffalo Police Department. As shown by these pages, although Plaintiffs were given considerable leeway to take Defendant Derenda's deposition over the course of three separate days, Plaintiffs did not use anywhere near the fourteen hours they request in this motion for the deposition of Defendant Lockwood. This is especially true considering that there were breaks and recesses during the days when Defendant Derenda was deposed.

6. Based on this testimony, and based on the arguments set forth in the accompanying Memorandum of Law, Defendants respectfully request that Plaintiffs' motion to depose Defendant Lockwood for fourteen hours be denied.

Dated: June 15, 2023

//s Peter A. Sahasrabudhe  
Peter Sahasrabudhe